CHAPTER 11
INTERIM HOLDING FACILITY

11-1. Introduction. This chapter presents an overview of the regulatory requirements, organizational responsibilities, and general requirements for the IHF. The IHF is constructed for the receipt, temporary storage and removal of RCWM from the site. The PMNSCM is responsible for preparing an IHF Plan to provide information about the temporary storage of RCWM in a safe, secure and environmentally sound manner.

11-2. IHF Regulatory Requirements. IHF operations will be in compliance with DA and other regulatory guidelines. Some of the major regulatory requirements for IHF operations include:

a. An EPA identification number will be obtained by the USACE district as the generator of RCWM per 40 CFR 264.11.

b. RCWM hazardous waste must be characterized according to 40 CFR 264.12, then labeled in accordance with 40 CFR 262.34. An operating record must be maintained in accordance with 40 CFR 264.73-264.76 and applicable local regulatory requirements.

c. Appropriate signs must be posted restricting access to the facility per 40 CFR 264.14. Agent and supplemental signs will be posted in accordance with DA Pam 385-61.

d. IHF inspection procedures must be in accordance with 40 CFR 254.15 and available on-site for inspection per 40 CFR 264.74.

e. All personnel involved in hazardous waste management must be HAZWOPER trained in accordance with 29 CFR 1910 to ensure they can implement emergency procedures and activate the facility contingency plan as required by 40 CFR 264.50-264.56.

f. The IHF must be equipped with a secondary containment system per 40 CFR 264.75 and all wastes must be stored separately in containers that are compatible with the waste they contain per 40 CFR 264.172.

g. Storage of recovered RCWM will be in accordance with AR 385-61, DA Pam 385-61, AR 385-64, DA Pam 385-64, AR 50-6, and AR 190-11.

11-3. Organizational Responsibilities. The primary organizations participating in IHF activities on FUDS include the executing district, PMCD/PMNSCM, SBCCOM, and USAESCH.

a. The USACE District. The district executing the RCWM response project has the following responsibilities for IHF operations:

(1) Exercise site control per the IHF Plan and Work Plan during all phases of RCWM recovery operations.

(2) In close coordination with PMCD, select the IHF location and exercise control of RCWM after receipt from the recovery site until the RCWM is removed from the IHF and shipped off-site for treatment.

(3) The district may delegate signature authority for the manifest in accordance with EP 200-1-2, Process and Procedures for RCRA Manifesting. The physical custody of the RCWM will be immediately transferred to the TEU. As generator of the waste, the district will retain accountability until the waste is transported off-site.

(4) Coordinate standby decontamination, medical support, and emergency response during all phases of recovery, on-site transport, and storage.

(5) Oversee site operations conducted by TEU to manage RCWM safely.

(6) Support routine maintenance of the IHF.

(7) Inspect IHF operations to ensure compliance with directives.

(8) Provide physical security support for site operations.

(9) Conduct public involvement in coordination with PMCD.

(10) Coordinate with PMNSCM if failure of the IHF structure or major components occur. Should repair be impractical, coordinate with PMNSCM to replace the IHF and ensure that RCWM is transferred following procedures developed for receipt and storage of RCWM.

(11) Provide communications equipment to key organizations and emergency services.

b. PMCD/PMNSCM. The responsibilities of the PMCD/PMNSCM for IHF operation include:

(1) Provide safe and environmentally acceptable transportation and disposal of RCWM.

(2) Perform a Hazard Analysis that addresses the relative risk associated with the IHF Plan.

(3) Provide a portable IHF for use at the site, if required.

c. SBCCOM. The TEU is a specialized unit of the SBCCOM that may be tasked with the following IHF responsibilities:

(1) Support the district, PMCD, and USAESCH.

(2) Recover suspect RCWM items at the site.

(3) When directed by USAESCH, represent SBCCOM, assume physical custody of RCWM when recovered, perform assessment to determine fill contents, and package the RCWM in overpack containers.

(4) Escort RCWM during on-site transportation and operation of the IHF.

(5) Provide direct support to USAESCH/PMCD to perform monitoring. The TEU, in the absence of ECBC, will monitor the IHF for chemical agents stored in the IHF prior to opening. The TEU may be tasked to train district or district designated personnel to perform surveillance monitoring. The TEU may also be tasked to perform periodic IHF monitoring during long-term storage.

(6) Inspect the IHF periodically for signs of deterioration or other damage that could lead to release of chemical agent.

(7) Provide first response during any emergency situations that occur during recovery, overpacking, transportation, and storage operations.

(8) Train personnel in IHF operations, including proper lifting techniques and hazard communication training for all chemicals used at the site.

d. ECBC. The responsibilities of the ECBC for IHF operations include:

(1) Provide direct support to the TEU.

(2) Perform laboratory analyses of samples to determine if chemical agent is present.

(3) Provide the TEU with material handling equipment, monitoring devices, and calibration solutions, as requested.

(4) Provide sampling capability (monitoring equipment and personnel) at the IHF for first entry monitoring.

e. USAESCH. The responsibilities of the USAESCH during IHF operations include:

(1) Provide direct support to the district in preparation of the site work plan and Safety Submission.

(2) Provide on-site expertise during site investigation.

(3) Conduct IHF vulnerability assessment.

11-4. General Requirements. General design and safety requirements for the IHF are discussed below.

a. Design of the IHF. The IHF is a storage building provided by PMNSCM and designed to hold RCWM. The IHF design is the product of PMNSCM and meets all storage parameters necessary for the temporary storage of RCWM. The specifications for the IHF are identified within the IHF Plan, one of PMNSCM's submittals for the Safety Submission.

b. IHF Security. Security for the IHF, when RCWM containing chemical agent or explosives are stored within, is the same as for Category II ammunition and explosives as described in AR 190-11, Physical Security for Arms and Ammunition. Surety measures are not applicable to RCWM items. The IHF should have the following physical security provisions:

(1) 24 hour guard force.

(2) Barriers.

(3) Lighting.

(4) Signs.

(5) Access control.

(6) Locks and Keys.

(7) Containment.

c. IHF Siting Plan. An IHF Siting Plan is required for all IHFs on a project site. The format for this plan can be located at the following website:
http://www.hnd.usace.army.mil/oew/policy/dids/didindx.html under DID OE-065.

11-5. Industrial Chemicals. Storage considerations concerning intact containers, other than ordnance configurations, which contain commercial chemicals such as chlorine, hydrogen cyanide, potassium cyanide, carbonyl chloride, cyanogen chloride, chloropicrin, etc. will conform to the requirements and guidance in AR 50-6 and practices which are generally acceptable for industrial operations.